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CONSOLIDATED SOAH DOCKET 473-19-1265

CONSOLIDATED PUC DOCKET NO. 48785

PUBLIC UTILITY COMMISSION  
FILING CLERK

JOINT APPLICATION OF ONCOR	§	BEFORE THE STATE OFFICE
ELECTRIC DELIVERY COMPANY LLC,	§	
AEP TEXAS INC., AND LCRA	§	
TRANSMISSION SERVICES	§	
CORPORATION TO AMEND THEIR	§	OF
CERTIFICATES OF CONVENIENCE AND	§	
NECESSITY FOR 345-KV TRANSMISSION	§	ADMINISTRATIVE HEARING
LINES IN PECOS, REEVES, AND WARD	§	
COUNTIES, TEXAS (SAND LAKE TO	§	
SOLSTICE AND BAKERSFIELD TO	§	
SOLSTICE)	§	

**PLAINS MARKETING, L.P., AND PLAINS PIPELINE, L.P.'S  
MOTION TO INTERVENE**

Plains Marketing, L.P., And Plains Pipeline, L.P.'S (Collectively, Plains), file this Motion to Intervene and respectfully requests that Plains be granted party status in this proceeding.

I.

Plains seek to participate in the above-captioned proceeding pursuant to Public Utility Commission ("Commission" or "PUC") PROC. R. 22.103 and 22.104. Plains own and operate pipelines and other facilities in the study area that are traversed and/or paralleled by more than one route proposed in this proceeding. Therefore, Plains will be affected by the Commission Order in this proceeding. Plains has a justiciable interest that may be adversely affected by the outcome of this proceeding and should be granted party status.

II.

Plains requests that it be served with all future discovery, pleadings, orders and correspondence regarding this case in accordance with the following service address:

Catherine J. Webking  
Scott, Douglass & McConnico, LLP  
303 Colorado Street, Suite 2400  
Austin, Texas 78701

512.495.6337  
512.495.6399 (fax)  
[cwebking@scottdoug.com](mailto:cwebking@scottdoug.com)

III.

Wherefore, Premises Considered, Plains respectfully requests that it be granted intervenor status to participate as a party in this proceeding.

Respectfully submitted,



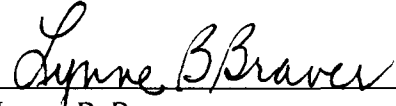
Catherine J. Webking  
State Bar No. 21050055  
[cwebking@scottdoug.com](mailto:cwebking@scottdoug.com)

SCOTT DOUGLASS & MCCONNICO LLP  
303 Colorado Street, Suite 2400  
Austin, Texas 78701  
512.495.6337  
512.495.6399 (facsimile)

**ATTORNEYS FOR  
PLAINS MARKETING, L.P., AND  
PLAINS PIPELINE, L.P.'S**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument has been served in accordance with the governing procedural orders to all parties of record in this proceeding on this 21<sup>st</sup> day of December.

  
\_\_\_\_\_  
Lynne B. Braver